

DOC #3

# ***IDAHO FARM BUREAU FEDERATION***

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September 5, 2000

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Governor Dirk Kempthorne  
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Attn: Jim Yost

The Idaho Farm Bureau Federation representing 50,000 member Idaho families, has reviewed the massive document titled Draft Biological Opinion and have some general observations regarding the document, some specific questions and recommendations regarding various sections within the document.

We note in the All H papers that NMFS indicates it is surprising how little information is really known regarding Salmon and their life cycle. As an organization representing Idaho ratepayers and taxpayers, we feel it is more than surprising how little we know. It is simply astounding that with the masses of dollars poured into this program that we don't know even the basics of the species let alone how to recover them. The Biological Opinion, which is supposed to be the pathway to recovery, is totally replete with speculation, supposition, guess work and biases. It appears to be a consensus document put together by committee and supposedly sold to the rest of us as something supported by science when in fact, most of it is sheer speculation.

Basic information such as whether migrating smolt need to eat is not known. Simple animal physiology would tell us that juveniles embarking on a 14 to 30 day journey need some form of sustenance and yet there is no information regarding this issue.

Many of the statistics used in the document seem to be skewed at best and totally unbelievable when they are used to demonstrate transportation survival. Much of the data is old, outdated and has not incorporated latest statistics, especially if later data indicates improvement in

survival rate. Data should be used for trends, and since salmon statistics are ever changing, it is imperative that latest data be incorporated into the results.

As an organization representing many animal producers with expertise in population dynamics and disease control it is unbelievable to us that in all of this massive oration of goals, statistics, demands and observations, that disease control is not a part of the equation. Somehow, the fact that hatcheries have managed to spread Bacterial Kidney Disease throughout the Salmon population is simply overlooked. Rearing thousands of fish together before releasing into our rivers has undoubtedly spread hosts of other diseases to the rivers as well and it is not even mentioned. There is nothing in the document demanding that hatchery fish be certified as being free of disease. There is no attempt to require that hatchery fish be vaccinated to ward off known infectious diseases, and there is no health considerations involved in the speculation that has created the Draft Biological Opinion. Where are the animal scientists that would bring some sort of professional reason to mass animal rearing? At what point do we decide that fish are really no different than trying to mass produce any other animal species? We cannot imagine that a poultry raiser would simply ignore disease issues when trying to rear massive numbers of chickens. Disease transmission would simply destroy such an operation, and the same goes for all other animal species. Perhaps NMFS should ask a commercial fish producer if there is any need for such things as disease control, vaccinations, treatments or the like. Certainly there is, and the commercial industry is producing a fish that will be eaten in one year. Salmon hatcheries are dealing in fish that will take 2 to 3 years to grow and mature as well as having to migrate vast distances and return. It seems disease would be a very limiting factor, yet this document simply ignores the possibility and of course the obvious consequences. Perhaps it is the diseased fish released into the rivers and streams that account for much of the statistics that are chalked up as "Delayed Mortality". NMFS likes to speculate that every smolt that survives past Bonneville Dam either returns or is lost to Delayed Mortality with the exception of those masses that are eaten by predators or caught. Perhaps the observation that has led to the speculation that smolt do not need to eat during their migration is really predicated upon some biologist noting that many don't seem to feed. A disease-riddled fish probably doesn't eat and probably will die from stress and will probably end up in the statistics known as Delayed Mortality. We recommend that this opinion be immediately modified to include animal scientists, disease experts and veterinarians so that the latest in disease control and animal population dynamics will be understood and then modified to include these modern day recommendations. We are afraid that it will take more than just watching the fish and trying to control the entire habitat to actually recover them. Some usable science will have to be applied.

We note that this Biologic Opinion admits to knowing nothing more than speculation regarding the Columbia Plume and it's interaction with the California Current. The document frankly admits that it is not sure of the interaction of the smolt with the plume but assumes the transition zone to be critical to the survival of the smolt. Frankly, it is unbelievable that so little is known and yet NMFS devises flow theory and habitat creation as though it is somehow known that these changes will produce more fish. It in fact may, but an area so vital seems like it should have more emphasis, more research, and more expertise before we get into the process of modifying things. Apparently, those who believe that the way the river was before the dawn of mankind believe we must recreate this exact scenario to recover the fish. Maybe we do, but animal populations are dynamic and capable of change and adjusting to changing conditions. Perhaps destroying every trace of mankind, or buying up all the shoreline from Astoria, OR to Jackson Hole, WY may not be necessary.

Harvest is included in the biologic opinion, but is dismissed as having no impact on recovery because of a treaty with Canada and an agreement with the Tribes. The document really has no clue as to where the different ESUs are reared. It has some data regarding catch and supposes that because certain tagged populations are caught in more abundance in one location that the ESU is raised in the area. We do know that certain populations of Salmon seem to have fared better under warmer ocean conditions than others, and that a colder ocean seems to be benefiting all ESUs. Perhaps this document needs to establish just where the ESUs are reared, what is their food source and maybe the crash in populations from the Columbia area are more tied to ocean conditions in specific areas than to habitat problems on the other end. The document unfortunately assumes that everyone abides by the treaty and harvesting agreements, but we doubt that many do. Poaching, illegal gill netting, trawlers illegally fishing and other governments simply taking fish are probably still over harvesting the resource, and creating the statistics that leads NMFS to believe all of the smolts are dying from Delayed Mortality. We firmly believe more information on harvest is necessary before we decide to destroy irrigated agriculture or destroy dams because not enough adults are returning from an ocean that we know little about.

We do feel strongly that this document is not nearly sufficient in the predator control area; however, we are pleased to see that at least predation is not now totally dismissed as unimportant like Idaho Fish & Game is prone to do. Control of birds, pikeminnows, seals and sealions can be done. It is time for NMFS to get on with it and control the problem, not try to balance their actions to please every environmentalist and bird lover in the nation. NMFS is only too happy to demand grazing must be destroyed in order to questionably save redds, but when all of the smolts produced are simply eaten by predators, that is somehow overlooked and NMFS is strangely silent on the issue. This program would be much better accepted if NMFS would actually remedy a problem rather than study it to death or simply ignore it.

In reading the massive document, it is hard to decide when recovery is important and when saving jobs depending upon the Endangered Species Act take precedence. This document does little to convince us that all is well, coordinated and resources are willingly shared amongst the federal participants. The demands of NMFS and USFWS on all the other "action" agencies, including simply devastating their congressional appropriations probably will not work well even though it is written that it will. The effort will probably be about as fragmented and resented as it is now, so we do not expect great things from this Biological Opinion.

A problem with this entire document rests in the fact that hatchery fish have been relegated to throw aways and characterized as genetically inferior refuse. There is something about this inbred opinion of fisheries biologists that isn't at all truthful. Certainly we agree that fish that have been programmed in one environment may not do well in another, but eggs taken from a female fish taken from a stream, fertilized in a hatchery from a male from the same stream and produce smolt that are released back into the stream cannot be genetically inferior. Such individuals migrate to the ocean and back and somehow are bedeviled by the biologist as then being incapable of spawning at a rate that is acceptable. It is nonsensical to believe fertilizing a salmon egg in a hatchery somehow depletes it's libido. This is sheer nonsense and it is time that the scientific community really look at this issue with trained geneticists and animal scientists so that the fisheries biologist myths can be dispelled. If transplanting these smolts to streams overwhelms the available food then we can see where they should not be transplanted. If they are diseased (like many are) then we can see where the fisheries biologist observer would conclude that they are inferior. But the fact is, they should not be inferior and are probably every bit as capable of recovering an ESU as the wild stock. This myth must be

corrected if we are to ever recover the salmon population. We, along with most of the public will simply not tolerate these fish being clubbed to death because some fisheries biologist thinks they are inferior. The entire Biologic Opinion must be changed to reflect science - not wishful or fanciful thinking of the biologist observer.

Our final general observation of this document is that it is large, technical, tedious and fragmented so that it is not easily read or understood. It cites too many documents not readily available to the reader and refers to the All H paper as the underlying strategy for recovery. Interestingly, the All H is written in the same manner as the Biological Opinion. Most readers will require more than 60 days simply to check out the references and referrals and trying to digest and understand such a voluminous document will simply require more than a 60 day consideration. It is extremely offensive to us as both an organization and taxpayers to have NMFS and USFWS indicate they will only listen to states and tribes and that individuals are simply overlooked and unimportant in the decision making. On top of that revelation, to only give 60 days to comment on such a proposal certainly is insulting.

Some of our specific comments regarding the proposal are as follows:

On pp. 1-9 We note that NMFS tries to justify its suppositions based upon what they refer to as a "conservative substitute". They indicate such substituting for science is likely to exceed expectations. We disagree that NMFS substitutes the data and then decides it is likely to exceed real scientific data. This type of speculation in a document heralded as a recovery plan is unacceptable.

On pp. 2-8 in the discussions of the All H Paper the feds attempt to defend their crafting the strategy in total secrecy by indicating they had a few public hearings after their effort. The invitation list to craft the strategy oddly did not contain any animal scientists, disease specialists, or recognized geneticists.

On pp. 2-9 they indicate that most everything having to do with the life cycle was supplied by the PATH group - which is again lacking in expertise in animal populations and disease control. This probably accounts for the extreme weakness of this paper in substantive health and disease issues affecting fish.

On pp. - 2-9 we note the Federal Caucus will comply fully with executive orders. When President Clinton indicated he wanted more electricity generated by BPA at the expense of fish - was there any conflict in the minds of those responsible. Violating one federal law to implement a presidential order? Perhaps, this policy needs some refining for right now it looks unexplainable.

On pp. 3-4 we note NMFS proposes to demand more water than the 427,000 acre-feet currently sent down the Snake for salmon recovery. It seems strange that water hydrologists have determined that flow augmentation does nothing for salmon, but NMFS is determined to get more. Scientifically this must be resolved for it appears at this point that NMFS, doesn't know, but, is simply pushing to get their way over the objections of the state, and we who pay the bill for such folly. This section needs to be considerably refined and additional Idaho water demands dropped by NMFS. A strategy that might help would be to put in more off stream storage. Many streams are prone to dewatering in drought years but with off stream storage of water such streams can continue to have a minimum stream flow,

which would be good for salmon and good for the state of Idaho. NMFS should take a leadership role in helping to secure and pay for more off stream water storage in Idaho.

On pp. 3-5 regarding the use of Powerhead space. The State of Idaho specifically objects to the theory that powerhead space exists or that it belongs to the Bureau of Reclamation. This is not available for flow argumentation and the Idaho Farm Bureau fully backs the State of Idaho in declaring use of powerhead space is illegal and would support any suit against BOR or NMFS to prove it.

On pp. 3-6 we note lowering dam pools to increase velocity which is intended to increase the migration rate and survival of smolts, is mostly theoretical. We feel more data is needed to prove this questionable point.

On pp. 3-8 regarding Predator Control Program, we believe a much more aggressive approach must be initiated by NMFS and the action agencies to control or destroy salmon predators. We have noted the entire federal apparatus can go berserk over the loss of 4 smolt in a low water portion of the Lemhi River, but are content to mostly ignore the total destruction of up to 40% of all the smolts passing through the lower Columbia. Somehow NMFS and USFWS must come to grips with the reality that predators can and will destroy recovery plans. It is important and lack of action reflects poorly on the entire federal apparatus and especially bad on NMFS and USFWS.

On pp. 4-5 the speculation regarding hatchery fish is certainly provable or refutable. It seems NMFS and USFWS should get on with researching the correct answer rather than dabble all over the spectrum developing statistical tables to support any evenifi.

On pp. 4-13 the speculation regarding hatchery fish is again predicated upon theol"M hatchery fish are somehow inferior throwaways that will dilute out wild genes. The whole table is sheer speculation and absolute nonsense. Again, the American public and the Idaho Farm Bureau will not tolerate fish managers clubbing returning adult hatchery fish as though they are worthless and intolerable.

On pp. 5-3 it is interesting to note that NMFS uses old figures to support their theory of mortality caused by the hydrosystem. Please update the figures and note that vast improvements are occurring in smolt survival.

On pp. 5-4 NMFS tries to point out their theory for why streams tend to heat up during the summer. It is interesting to note that NMFS does not recognize that many of these streams traverse desert areas and that if the ambient temperature is 105 degrees F. that the water will warm regardless of all of the speculation that the habitat was eaten by a cow. One thing that certainly was forgotten in the speculation is the effect of forest fires on warming water temperatures. Adult Salmon, smolts, redds, and other water creatures do not do well in streams that boil from being burned up in a forest fire. Such streams probably won't support much of a population of anything for awhile, so maybe this should be included in the theory since half of Idaho has already burned up. Perhaps management of forests should be included in the mix of things affecting fish since it has a terrific impact.

On pp. 5-5 the generalization of irrigation as mostly consumptive and bad for fish is a generalization that may be partially true in some areas, but in Idaho, irrigation is the main

reason Snake River flows are larger than they were historically and return flows to the river are mostly fish friendly and of higher quality than river water. These facts should be included in any federal dissertation on irrigated agriculture so that the uninformed get a true picture of both pluses and minuses.

On pp. 6-10 There is considerable discussion regarding the reduction of silt and suspended particulate matter in the lower Columbia and the effect this has had on habitat diversity. Certainly if sediment transport is that important, then the issue of removing all sediment put into the river by irrigation and urban runoff could be modified to allow more sediment into the river which is probably a violation of the Clean Water Act. In this same section it is again astounding to us that NMFS knows so little about the Columbia River Plume, its interaction with the California Current and it's importance to Salmon. An issue this critical to the survival of the entire species should be well known and totally researched. It appears to us that millions of research dollars supplied by ratepayers and taxpayers over the years have been simply squandered by NMFS and we have either nothing or very little to show for massive expenditures. Perhaps this too indicates part of the reason for anadromous fish declines.

On pp. 6-12 as NMFS speculates on possible delayed mortality from the bypass system it is simply astounding to us that this is still totally unknown. Speculation especially about steelhead becoming more vulnerable to predation because of stress and concentration as a result of not having enough up river water is typical of the clouded thinking in this opinion paper where solutions are crafted to support pet theories for control of water that have nothing to do with fish. The logical reason steelhead smolts may be subject to mass predation is because they are probably sick from hatchery produced disease. Delayed Mortality (if it exists at all) is probably Mother Nature's way of ridding the ecosystem of diseased fish and has very little bearing on transport, stress or predators. More water is not needed except in the mind of those who know that control of water is power and to take it for whatever reason will lead to the control they seek. Fish are simply a pawn in the exercise.

On pp. 6-15 through 6-20, the mental gyrations that NMFS uses to justify a theory called Delayed Mortality is probably totally false even though it has been characterized by NMFS as "Best Professional Judgement". All of this speculation is based merely upon observations by fishery biologists and has nothing to do with science or professional judgement. The concept may actually be occurring, but it will take more than wishful thinking on the part of NMFS to support its existence. Good basic research could and would delineate the problem if it exists and dismiss it if it is a non working theory. Again, with the millions of dollars spent by ratepayers and taxpayers, it seem odd that this pet theory of NMFS isn't yet known.

On pp. 6-23 we note very large losses of adult salmon ranging from 15.4% for sockeye and almost 40% for chinook. Speculation in this document demonstrates conclusively that NMFS doesn't know what happens to the fish and apparently doesn't care or they would have found out what is happening to them. Since the chinook are the largest of the species it appears take may be related to size and gill nets are somewhat size selective for catching the larger fish. It seems odd to us, (that do not use gill nets anywhere between the eight dams), that NMFS doesn't as yet have a clue as to what is happening to the chinook. It is obvious what is happening. NMFS may not want to look at the problem, but it won't improve

or go away until it is addressed. A poaching rate of 40% seems large enough to attract the attention of either NMFS or the regulatory apparatus of the USFWS. This is an example of a Biological Opinion that cannot work because NMFS cannot or will not address a known take.

On pp. 6-35 again NMFS is working on pet theories to secure more water and trying to equate some logic as to why it might work. The premise is based strictly on the observation that in years when more water went down the river more adults returned. With all the variables and total unknowns in this equation, NMFS thinks more water is the key and develops batches of theories to support their thinking. It is time to prove some of the speculation, for as federal agencies have proven time and time again, their theories are usually wrong.

On pp. 6-47 we totally disagree with the modeling done on pikeminnow predation. 16.4 million smolts consumed is a very low estimate as is consumption rates of .06 salmonids per predator. We feel the pikeminnow control program must be improved and strengthened. 10 % to 20% is much too modest an exploitation rate and we suggest a figure of 50 to 75%. Remember, if 4 smolts lost on the Lemhi can create total hysteria amongst the federal agencies, then turning their collective and apparently unconcerned backs on the loss of 20 million smolts makes no sense. Somehow, NMFS must address these huge problems with the same zeal that they close the headgates on the Methow. On pp. 6-51 we note NMFS is uncertain whether smolts have a biological requirement for food in the juvenile migration corridor, or if food is even required. This seems rather basic and without this knowledge recovery of the species seems perilous at best. The question that goes begging is, "Why doesn't NMFS know if juvenile chinook salmon need food?" Lack of this kind of basic knowledge would lead most of the readers of this long tedious dissertation on theory to believe that NMFS is incompetent.

On pp. 6-56 the statistics presented for fall chinook smolt in-river and transport survival rate makes no sense. If 48 per cent of the smolt are transported with a survival rate of 98% and in river migrants survived at a 10% rate, NMFS estimates the total system survival rate of all smolts to be only 12%. Something is wrong with this picture and with the statistics. On the same page NMFS speculates that spawning may be inhibited at temperatures above 61 degrees F. Why isn't this known? With the millions spent basic information like spawning success vs. temperature should be known and not speculative.

On pp. 6-63 and elsewhere in the document, NMFS seems intent to improve the downstream conditions for migrating kelts and we wonder if the results will ever be worth the effort. According to literature we have read, kelts have never been much of a percentage of the steelhead population and to concentrate time effort and expenditure on this small segment seems relatively non productive, especially in light of NMFS doing nothing about 1/3 of the entire juvenile migration population being eaten by birds.

We note that NMFS promises on pp. 9-4 that the reasonable and prudent alternatives will be evaluated in a disciplined and rigorous way. We feel this is good for NMFS to adopt such plans and we would suggest that they go about research, depredation and take in the same manner. Perhaps with a little disciplined and rigorous effort NMFS could find out what is happening to adult chinook between the eight dams on the river, whether smolt need food and why hatcheries supply diseased fish.

On pp. 9-5 we note that NMFS indicates that breaching the four lower Snake River dams would provide more certainty of long-term survival and recovery than would other measures. With what little knowledge that is known about the salmon, the river, the ocean, the predators, the hatcheries, the harvest or even the ocean rearing areas for different ESUs we are concerned that NMFS really doesn't know if breaching the dams would lead to anything but wishful thinking. This document is speculative and theoretical at best and hardly worthy of focused policy making regarding breaching or anything else. The good part of the Biological Opinion is that it does address some of the unknowns and this information will be helpful for future decisions.

The conceptual problems which we have problems with have been outlined above and we note the same concepts are woven throughout the remainder of the document. Rather than continue to outline the specific sections in the remainder, suffice it to say the Idaho Farm Bureau Federation has problems specifically with flow argumentation and with many of the theories advanced throughout this document. One issue that has arisen since this document has been released is the realization that electrical supplies are not keeping up with demand. Threatened blackouts and spiraling prices in California have forced the current administration into a dose of reality were they have simply demanded increased electricity generation out of the system without concerns for fish. We feel electricity is a necessity and to do without it will quickly lead the consumer to solutions that may not be fish friendly. This paper needs a good sense of reality included in its recommendations, for the American public will not do without electricity. Fortunately, the Idaho Farm Bureau strongly believes that we can have a viable and functional electrical generation system and a functional salmon recovery operation on both the Snake and Columbia Rivers. Basic research will prove that it is both feasible and practical, but NMFS and USFWS must be charged with making both systems work. Only then will this speculation based upon wishful thinking and pet environmentalist theory be set aside and practical solutions to Salmon Recovery initiated. We think it can happen and we believe both NMFS and USFWS should get on with it.

Sincerely,

Frank Priestley, President  
Idaho Farm Bureau Federation

C: IFBF Officers, Directors & Staff

County Presidents  
Senator Larry Craig  
Senator Mike Crapo  
Congressman Helen Chenoweth  
Congressman Mike Simpson  
Idaho Fish & Game  
Idaho Water Users  
IDWR  
ICIE  
Potlatch Corp.  
Washington Farm Bureau  
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Montana Farm Bureau